

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FARAH JEAN FRANCOIS,

Plaintiff,

-against-

**VICTORY AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI and
SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI, STAVROS ORSARIS,
YESSICA VALLEJO, DAVID PEREZ,
DIANE ARGYROPOULOS, and
PHILIP ARGYROPOULOS,**

Defendants.

Case No.: 1:22-cv-4447-JSR

**DEFENDANTS' RULE 26(a)(3)
DISCLOSURES**

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PLEASE TAKE NOTICE that Defendants SPARTAN AUTO GROUP LLC d/b/a VICTORY MITSUBISHI (“Spartan Auto”), STAVROS ORSARIS, (“Orsaris”), YESSICA VALLEJO (“Vallejo”), and DAVID PEREZ (“Perez”) (sometimes collectively “Defendants”), by their attorneys, Nicholas Goodman & Associates, PLLC, and J. L. Russo, P.S., provide the following disclosures pursuant to Fed. R. Civ. P. (“FRCP”) Rule 26(a)(3):

1. The name and, if not previously provided, the address and telephone number of each witness:

a. Defendants Expect to Present:

- i. Farah Jean Francois
- ii. Yessica Vallejo
- iii. Stavros Orsaris
- iv. Emmanuel Laforest

b. Defendants May Present if Needed:

- i. David Perez
- ii. Papito Momplaisir

2. The designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographical, a transcript of the pertinent partes of the

deposition:

- a. Emmanuel Laforest. To the extent that Mr. LaForest does not appear to testify at trial in person despite reasonable efforts to compel his appearance, Defendants reserve the right to read the entirety of his deposition transcript into the record if necessary.

3. An identification of each document or other exhibit, including summaries or other evidence:

a. Defendants Expect to Offer:

- i. Defendants reserve the right to introduce any and all documents identified in Plaintiff's Rule 26(a)(3) Disclosures (see ECF Document No. 70).

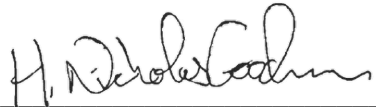
b. Defendants May Offer if Needed:

- i. Defendants reserve the right to introduce any and all documents identified in Plaintiff's Rule 26(a)(3) Disclosures (see ECF Document No. 70).

Dated: New York, New York
October 25, 2024

Yours, etc.

NICHOLAS GOODMAN & ASSOCIATES, PLLC

BY: _____

H. Nicholas Goodman

Attorney for Defendants

SPARTAN AUTO GROUP LLC d/b/a

**VICTORY MITSUBISHI, STAVROS ORSARIS,
YESSICA VALLEJO, and DAVID PEREZ**

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